

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Hearing Date: August 12, 2025 at 9:30 a.m. (ET)

Objection Deadline: August 1, 2025 at 4:00 p.m. (ET)

Ref. Nos. 31060 & 31077

**CERTIFICATION OF COUNSEL REGARDING FTX RECOVERY TRUST’S ONE
HUNDRED EIGHTY-SIXTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN LATE FILED PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On June 26, 2025, the FTX Recovery Trust filed the *FTX Recovery Trust’s One Hundred Eighty-Sixth (Non-Substantive) Omnibus Objection to Certain Late Filed Proofs of Claims (Customer Claims)* [D.I. 31060, redacted & 31077, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection [D.I. 31060-1 & 31077-1], any responses were to be filed no later than August 1, 2025 at 4:00 p.m. (ET) (the “Response Deadline”).

3. The FTX Recovery Trust received informal responses (the “Informal Responses”) to the Objection from the holders of claim numbers 99973 and 99976.

4. On July 24, 2025, George Sakhel (“Sakhel”) filed a response to the Objection

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 26404-1].

[D.I. 31947] (the “Sakhel Response”).

5. On July 30, 2025, Alan Roy Burden (“Burden”) filed a response to the Objection [D.I. 31999] (the “Burden Response”).

6. On August 1, 2025, Lawrence Van Dyn Hoven (“Van Dyn Hoven”) filed a response to the Objection [D.I. 32062] (the “Van Dyn Hoven Response”).

7. On August 1, 2025, David Stephen Sun (“Sun”) filed a response to the Objection [D.I. 32064] (the “Sun Response”).

8. As of the Date hereof, no other responses to the Objection have been filed or served on the FTX Recovery Trust.

9. The FTX Recovery Trust has revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournment of the Objection solely with respect to the claims held by Sakhel, Burden, Van Dyn Hoven, and Sun, and claim numbers 99973 and 99976. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

10. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: August 5, 2025
Wilmington, Delaware

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